



**Service of Process
Transmittal**

12/13/2021

CT Log Number 540731222

TO: Michael Johnson, Legal Assistant
The Hartford
1 Hartford Plz, HO-1-09
Hartford, CT 06155-0001

RE: Process Served in Louisiana

FOR: Navigators Specialty Insurance Company (Domestic State: NY)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: MADISON COLLINS vs. HOLLEY S. OBANNON

DOCUMENT(S) SERVED: Letter, Citation, Petition, Request

COURT/AGENCY: 31st Judicial District Court, Parish of Jefferson Davis, LA
Case # C066421

NATURE OF ACTION: Insurance Litigation

ON WHOM PROCESS WAS SERVED: C T Corporation System, Baton Rouge, LA

DATE AND HOUR OF SERVICE: By Certified Mail on 12/13/2021 postmarked on 12/10/2021

JURISDICTION SERVED : Louisiana

APPEARANCE OR ANSWER DUE: Within 15 days after you have received these documents (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): L CLAYTON BURGESS
405 WEST CONVENT ST
PO DRAWER 5250
LAFAYETTE, LA 70502
337-234-7573

ACTION ITEMS: CT has retained the current log, Retain Date: 12/13/2021, Expected Purge Date: 12/18/2021

Image SOP

Email Notification, Michael Johnson MICHAEL.JOHNSON@THEHARTFORD.COM

Email Notification, Fiona Rosenberg Fiona.Rosenberg@thehartford.com

REGISTERED AGENT ADDRESS: C T Corporation System
3867 Plaza Tower Dr.
Baton Rouge, LA 70816
800-448-5350
MajorAccountTeam1@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other



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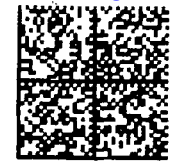
advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

R. KYLE ARDOIN
SECRETARY OF STATE
P.O. BOX 94125
BATON ROUGE, LA 70804-9125

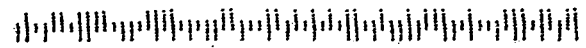
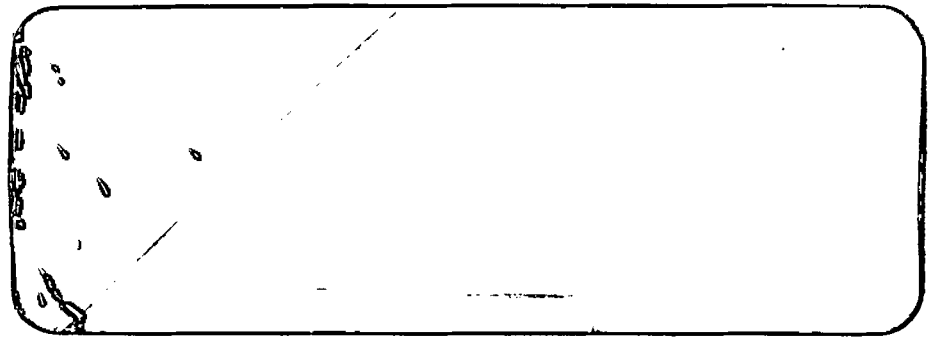


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FIRST CLASS



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**State of Louisiana
Secretary of State**

12/10/2021

Legal Services Section
P.O. Box 94125, Baton Rouge, LA 70804-9125
(225) 922-0415

NAVIGATORS SPECIALTY INSURANCE COMPANY
C/O CT CORPORATION SYSTEM
3867 PLAZA TOWER DR
BATON ROUGE, LA 70816

Suit No.: 66421
31ST JUDICIAL DISTRICT COURT
JEFFERSON DAVIS PARISH

MADISON COLLINS
vs
HOLLEY S. OBANNON, ET AL

Dear Sir/Madam:

I am enclosing a citation served in regard to the above entitled proceeding. If you are not the intended recipient of this document, please return it to the above address with a letter of explanation. All other questions regarding this document should be addressed to the attorney that filed this proceeding.

Yours very truly,

R. KYLE ARDOIN
Secretary of State

Served on: R. KYLE ARDOIN
Served by: M. LOCKWOOD

Date: 12/09/2021
Title: DEPUTY SHERIFF

No: 1220023

KC



CITATION

MADISON COLLINS

PLAINTIFF

VS.

HOLLEY S OBANNON, ALBRITTON FARMS, INC
& NAVIGATOR

DEFENDANT

NO. C-066421

31st JUDICIAL DISTRICT COURT
PARISH OF JEFFERSON DAVIS
STATE OF LOUISIANA

TO: NAVIGATORS SPECIALTY INSURANCE, THROUGH ITS AGENT FOR SERVICE OF
PROCESS, LOUISIANA SECRETARY OF STATE, 8585 ARCHIVES AVE, BATON ROUGE, LA
70809

YOU HAVE BEEN SUED.

Attached to this citation is a certified copy of the petition.* The petition tells you what you are being sued for. You must EITHER do what the petition asks OR, within FIFTEEN (15) DAYS after you have received these documents, you must file an answer or other legal pleadings, in writing, in the office of the Clerk of this Court at the Court House, 300 State Street, Jennings, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within FIFTEEN (15) DAYS, a judgment may be entered against you without further notice.

This citation was issued by the Clerk of Court for Jefferson Davis Parish, on the 1st day of December, 2021.

ATTORNEY:

L CLAYTON BURGESS
ATTORNEY AT LAW
405 WEST CONVENT ST
P O DRAWER 5250
LAFAYETTE, LA 70502-5250
337-234-7573

BY:

Christy Pickle
Deputy Clerk of Court

Returned & Filed

, 20

DEPUTY CLERK

*Also attached are the following documents:

☐ INTERROGATORIES

☐ REQUEST FOR ADMISSION OF FACTS

☐ OTHER

SERVED ON
R. KYLE ARDOIN

DEC 09 2021

SECRETARY OF STATE
COMMERCIAL DIVISION

ADDITIONAL INFORMATION

These documents mean you have been sued.
Legal assistance is advisable and you should contact a lawyer immediately.

JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE.

RECEIVED

2021 DEC -1 P 10:21

31ST JUDICIAL DISTRICT COURT
PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

MADISON COLLINS

VERSUS

DOCKET NO: C-664-21

HOLLEY S. OBANNON
ALBRITTON FARMS, INC.,
AND NAVIGATORS SPECIALTY INSURANCE

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes, **MADISON COLLINS**
residents of the City of Katy, County of Fort Bend, State of Texas who respectfully represent:

1.

Defendants are:

- a) **HOLLEY S. OBANNON**, upon information and belief, a person of the full age of majority and a resident of Dothan, Alabama, who was in the course and scope of her employer, Albritton Farms, Inc at all times relevant to the incident.
- b) **ALBRITTON FARMS, INC.**, upon information and belief, a corporation authorized to do and doing business in the State of Louisiana;
- c) **NAVIGATORS SPECIALTY INSURANCE**, upon information and belief, a foreign insurance company authorized to do and doing business, at all times relevant, within the State of Louisiana, which provided coverage to the vehicle owned by **ALBRITTON FARMS, INC** and driven by **HOLLEY S. OBANNON**

2.

Defendants are indebted, jointly, severally, and *in solido*, for the following:

On November 29, 2021, Defendant, **HOLLEY S. OBANNON** was driving a 2017 Kenworth Construction vehicle, in the course and scope of her employer, **ALBRITTON FARMS, INC** on Interstate 10 around milepost 54. As the Defendant was driving, she passed a vehicle in the left lane, then merged back into the right lane. Defendant states in the police report that she did not see the vehicle driven by Bonnie S. Terral in the right lane and struck front of Bonnie S. Terral's vehicle causing the vehicle to spin and make contact with the 2017 Kenworth truck two (2) more times

before stopping facing Northeast with the rear of Bonnie's vehicle in contact with the front of the 2017 Kenworth. At the same time, Plaintiff, **MADISON COLLINS**, was driving in the same direction and saw Bonnie's vehicle spinning out of control in front of her and attempted to stop. However, she was unable to stop, and the next thing Ms. Collins recalls is her vehicle becoming airborne and flipping over before coming to rest in the ditch north of the service road on its wheels. A witness by the name of Jerry Pounds saw brake lights ahead of him and saw Ms. Collin's vehicle airborne and landing in the woods. In addition, Defendant, **HOLLEY OBANNON** was cited with La. R.S. 14:58, careless operation.

3.

As a result of the collision, **MADISON COLLINS** was injured, suffering injuries to her head, shoulder, neck, back, and other Musculo-ligamentous injuries for which he is due damages as follows:

- a) Pain and suffering; past, present, and future, in an amount reasonable in the premises;
- b) Mental anguish and anxiety; past, present, and future, in an amount reasonable in the premises;
- c) Medical bills and expenses; past, present, and future, in an amount reasonable in the premises;
- d) Residual physical and mental impairment; past, present and future, in an amount reasonable in the premises;
- e) Disability and/or disfigurement; past, present, and future, in an amount reasonable in the premises;
- f) Loss of enjoyment of life and other hedonic damages past, present and future, in an amount reasonable in the premises; and
- g) Loss of wages and earning capacity; past, present, and future, in an amount reasonable in the premises.

4.

The collision was a direct result of the negligence of **HOLLEY S. OBANNON** in the Course and Scope of her Employer, **ALBRITTON FARMS, INC** in the following non-exclusive, particulars:

- a) Failure to keep a proper lookout;
- b) Failure to maintain control of his vehicle;
- c) Cutting in, Improper passing

- d) Careless operation;
- e) Failure to do that which should have been done so as to avoid the collision set forth herein;
- f) Failure to exercise proper care while engaged in a dangerous maneuver; and
- g) Other acts and/or omissions that will be proven at trial.

5.

At all times relevant, **HOLLEY S. OBANNON** had permission to operate the vehicle owned by **ALBRITTON FARMS, INC.** and she was in the course and scope of its employment at the time of said accident, therefore **ALBRITTON FARMS, INC.** is vicariously liable for all said damages and injuries received by **MADISON COLLINS**.

6.

NAVIGATORS SPECIALY INSURANCE as the insurer of the vehicle owned by **ALBRITTON FARMS, INC.** is solidarily bound with them for all damages due. Pursuant to the terms of said insurance contract, **NAVIGATORS SPECIALTY INSURANCE** did agree to stand in judgment jointly, severally and in solido with the said **ALBRITTON FAMRS, INC.** for the acts done by **HOLLEY S. OBANNON**, which caused the injuries and damages complained of herein.

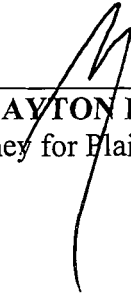
7.

Plaintiff, **MADISON COLLINS**, had her three children in the vehicle as well, who all suffered damages as a result of the acts described above including, loss of love and affection, consortium, financial and emotional support, services and companionship, etc., as a result of the injuries suffered by **MADISON COLLINS** and the three children.

WHEREFORE, plaintiff, **MADISON COLLINS** pray that this petition be filed and that defendants be duly cited and served with a copy of same and, that after legal delays and due proceedings had there be judgment in favor of plaintiffs and against defendants for a full and true sum of an amount reasonable in the premises to be proven at the trial on the merits of this matter, including attorney's fees, as provided by law, together with legal interest from date of judicial demand until paid, and for all costs of these proceedings and all other just and equitable relief.

Respectfully submitted:

L. CLAYTON BURGESS, A.P.L.C.
405 West Convent Street
Post Office Drawer 5250
Lafayette, Louisiana 70502-5250
Telephone: (337) 234-7573
Facsimile: (337) 233-3890



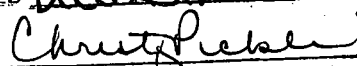
L. CLAYTON BURGESS (22979)
Attorney for Plaintiffs

PLEASE SERVE:

HOLLEY S. OBANNON
104 Woodleigh #4 Rd.
Dothan, AL 36305

ALBRITTON FAMRS, INC
3820 Peanut Road
Cottondale, FL 32431

NAVIGATORS SPECIALTY INSURANCE
Through its agent for service of process:
Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

FILED December 1, 2021


DEPUTY CLERK OF COURT
JENNINGS, JEFF DAVIS PARISH
A TRUE COPY-ATTEST

31ST JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

MADISON COLLINS

VERSUS

DOCKET NO: C-664-21

**HOLLEY S. OBANNON
ALBRITTON FARMS, INC,
AND NAVIGATORS SPECIALTY INSURANCE**

**REQUEST FOR NOTICE OF THE RENDITION
OF ALL INTERLOCUTORY ORDERS OR JUDGMENTS**

TO: Jefferson Davis Parish Clerk of Court
31st Judicial District Court
300 N. State St.,
Jennings, LA 70546

Formal request is hereby made for written notice within ten (10) days in advance of any date fixed for the rendition of all interlocutory orders or judgments, as well as notice of hearings and/or trials (whether on merits or otherwise), in the above numbered and entitled cause, as provided in the Louisiana Code of Civil Procedure, particularly Articles 1571, 1572, 1913, 1914.

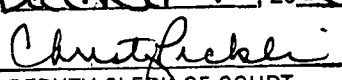
Respectfully submitted:

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Lafayette, Louisiana 70502-5250
Telephone: (337) 234-7573
Facsimile: (337) 233-3890



L. CLAYTON BURGESS (22979)

Attorney for Plaintiffs

FILED December 1, 2021


DEPUTY CLERK OF COURT
JENNINGS, JEFF DAVIS PARISH
A TRUE COPY-ATTEST